

**EXHIBIT "A"**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION

ELIZABETH STEFFENBERG,

Plaintiff,

v.

T. GENE GILMAN, STEVEN GILMAN, THE GILMAN  
INSURANCE AGENCY, INC., DAVID M. SCOLL,  
ARBOR SECURITIES, LTD., ALLIANCE  
INVESTMENT MANAGEMENT, COMMONWEALTH  
FINANCIAL HOLDINGS INC., FINANCIAL LINKS,  
INC., T. GILMAN & CO., LTD., FIRST ALLIED  
SECURITIES, INC., AVIVA LIFE INSURANCE  
COMPANY, TRADETEK, LTD. and TRADETEK, LLC,

Defendants.

CIVIL ACTION NO. 04-40113-  
FDS

**DEFENDANT DAVID M. SCOLL'S SECOND SET OF  
INTERROGATORIES TO THE PLAINTIFF**

Pursuant to Local Rules 26.5 and 33.1 of the Local Rules of the United States District Court for the District of Massachusetts, as well as Rules 26 and 33 of the Federal Rules of Civil Procedure, the Defendant, David M. Scoll (hereinafter the "Defendant" or "Scoll"), hereby requests that the Plaintiff, Elizabeth R. Steffenberg (hereinafter the "Plaintiff"), answer the following interrogatories:

1. Identify by title, date, author, and content any and all documents which constitute the "documentation" you state Scoll was provided from Gene Gilman "which reflected that the same companies Scoll was representing, including Gilman Insurance Agency, T. Gilman & Co., Commonwealth Financial Holdings, and Financial Links, were being used by Gene Gilman to manage the Steffenbergs' investments" according to your Supplemental Answer No. 4 to Scoll's First Set of Interrogatories.

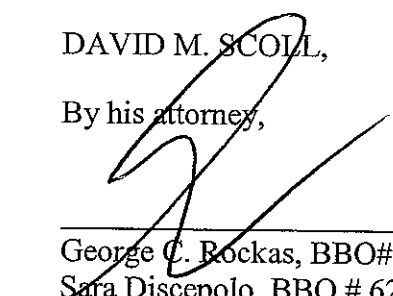
2. Identify any and all source(s) of information which form(s) the basis of your statement that "Scoll also served as a Director of Trade Tek and Commonwealth Financial Holdings for some period of time between 1998 and 2003" in your Supplemental Answer No. 8 to Scoll's First Set of Interrogatories.

If the source(s) of information include documents or tangible things, for each such item, provide: 1) the title of the document; 2) the date of the document; 3) the author of the document; and 4) the content of the document or description of the tangible item.

3. Identify by title, date, author, and content any and all documents which concern, reflect or support your statement that "in or about July, 1997, the Steffenbergs disclosed to Scoll that Gene Gilman had failed to repay them in accordance with the terms of a promissory note between Mr. Steffenberg and Gene Gilman, and that the final payment was due in December, 1997" in your Supplemental Answer No. 6 to Scoll's First Set of Interrogatories.

DAVID M. SCOLL,

By his attorney,



George C. Rockas, BBO#544009

Sara Discepolo, BBO # 628721

WILSON, ELSER, MOSKOWITZ,

EDELMAN & DICKER LLP

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Boston, MA 02110

(617) 422-5300

Dated: March 10, 2005

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION

ELIZABETH STEFFENBERG,

Plaintiff,

v.

T. GENE GILMAN, STEVEN GILMAN, THE GILMAN  
INSURANCE AGENCY, INC., DAVID M. SCOLL,  
ARBOR SECURITIES, LTD., ALLIANCE  
INVESTMENT MANAGEMENT, COMMONWEALTH  
FINANCIAL HOLDINGS INC., FINANCIAL LINKS,  
INC., T. GILMAN & CO., LTD., FIRST ALLIED  
SECURITIES, INC., AVIVA USA CORPORATION,  
AVIVA LIFE INSURANCE COMPANY, TRADETEK,  
LTD. and TRADETEK, LLC,

Defendants.

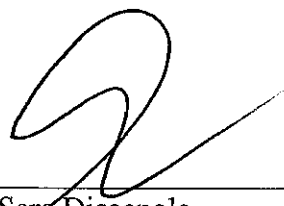
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**CERTIFICATE OF SERVICE**

I, Sara Discepolo, hereby certify that on March 10, 2005, I served the foregoing *DEFENDANT DAVID M. SCOLL'S SECOND SET OF INTERROGATORIES TO THE PLAINTIFF* on all parties/counsel of record by mailing the same via first class mail, postage prepaid, to the following:

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Sara Discepolo